FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Mar 06, 2024

SEAN F. MCAVOY, CLERK

Forfeiture Allegations

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UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA, 2:24-CR-33-MKD Plaintiff, **INDICTMENT** Vio.: 21 U.S.C. §§ 841(a)(1), v. (b)(1)(B)(viii), 846, Conspiracy to Distribute 50 DANIEL LIGHTLEY and CHRISTINE MIX, Grams or More of Methamphetamine Defendants. (Count 1) 21 U.S.C. § 841(a)(1), (b)(1)(C)Possession with Intent to Distribute Methamphetamine (Count 2) 18 U.S.C. §§ 922(g)(1), 924(a)(8) Felon in Possession of a Firearm (Count 3) 21 U.S.C. § 853, 18 U.S.C. 924(d)(1), 28 U.S.C. § 2461(c)

|INDICTMENT – 1

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about May 2023, and continuing to March 2024, in the Eastern District of Washington and elsewhere, the Defendants DANIEL LIGHTLEY and CHRISTINE MIX, and other individuals both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 21 U.S.C. § 846.

COUNT 2

On or about January 16, 2024, in the Eastern District of Washington, the Defendants DANIEL LIGHTLEY and CHRISTINE MIX, did knowingly possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 3

On or about January 16, 2024, in the Eastern District of Washington, the Defendant DANIEL LIGHTLEY, knowing of his status as a person previously

convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, firearms, to wit:

- a Remington .22 rifle bearing serial number 3293
- a Stevens 410 shotgun bearing serial number D286294
- a Marlin Model 60 .22 rifle bearing serial number 93404545
- a Thompson Carter Arms .22 pistol bearing serial number 283667
- a Winchester 10 gauge Model 1300 bearing serial number L3026487
- a Winchester Model L-70 bearing serial number 282404
- a Ruger 10-22 bearing serial number 829-03610
- a Ruger 10-22 bearing serial number 249-67177
- a Ruger 10-22 bearing serial number 121-13782
- a Sport King Special Model 25 Bolt Action Rifle bearing serial number

which firearms had been theretofore transported in interstate and/or foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841, 846 and/or 21 U.S.C. § 841, as set forth in this Indictment, the Defendants, DANIEL LIGHTLEY and CHRISTINE MIX, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to

be used, in any manner or part, to commit or to facilitate the commission of the offense.

The property to be forfeited includes, but is not limited to:

- a Stevens 410 shotgun bearing serial number D286294
- a Marlin Model 60 .22 rifle bearing serial number 93404545
- a Thompson Carter Arms .22 pistol bearing serial number 283667
- a Winchester 10 gauge Model 1300 bearing serial number L3026487
- a Winchester Model L-70 bearing serial number 282404
- a Ruger 10-22 bearing serial number 829-03610
- a Ruger 10-22 bearing serial number 249-67177
- a Ruger 10-22 bearing serial number 121-13782
- a Sport King Special Model 25 Bolt Action Rifle bearing serial number
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If any forfeitable property, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

Pursuant to 18 U.S.C. § 924(d)(l) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8), as set forth in this Indictment, the Defendant, DANIEL LIGHTLEY, shall forfeit to the United States

of America any firearms and ammunition involved or used in the commission of the offense, including, but not limited to:

- a Stevens 410 shotgun bearing serial number D286294
- a Marlin Model 60 .22 rifle bearing serial number 93404545
- a Thompson Carter Arms .22 pistol bearing serial number 283667
- a Winchester 10 gauge Model 1300 bearing serial number L3026487
- a Winchester Model L-70 bearing serial number 282404
- a Ruger 10-22 bearing serial number 829-03610
- a Ruger 10-22 bearing serial number 249-67177
- a Ruger 10-22 bearing serial number 121-13782
- a Sport King Special Model 25 Bolt Action Rifle bearing serial number

DATED this day of March 2024.

A TRUE BILL



Assistant United States Attorney

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